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 Attorney for Defendant

5 UNITED STATES DISTRICT COURT
 6 DISTRICT OF ARIZONA

7 United States of America,)	CR-20-00606-TUC-DCB-MSA
8 Plaintiff,)	Motion To Continue
9 v.)	Plea Deadline and
10 Siriaco Florencio De Leon-Vasquez,)	Trial Dates
11 Defendant.)	(First Request)

12 It is expected that excludable delay under Title 18, United States Code, §
 13 3161(h)(7)(A) will occur as a result of this motion or an order based thereon.

14 The **Defendant** through counsel, requests a **30-day continuance** of the plea deadline
 15 currently set for **April 3, 2020**, and the current trial date scheduled for **April 21, 2020**.

16 This request is based upon the need for reasonable time to effectively prepare for trial
 17 taking into account the exercise of due diligence under Title 18, United States Code,
 18 §3161 (h)(7)(B)(iv). Defense counsel avows that due diligence has been made to prepare
 19 this case for trial. Counsel further avows that this request is not made for the purpose of
 20 delay. This request for continuance is made for the following reasons:

- 22 1. Defense counsel needed additional time to set a change of
 23 plea hearing which is now reserved for April 7, 2020, pending
 24 an order continuing the current trial and plea deadline dates.
 the case with the defendant.
- 25 2. Assistant U.S. Attorney, **Ann L DeMarais** ,
 26 has no objection to this request

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RESPECTFULLY SUBMITTED:

March 12, 2020 .

DAVID G. ALVAREZ

s/ David G. Alvarez
DAVID G. ALVAREZ
Attorney for Defendant

I hereby certify that I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic filing to the following CM/ECF registrant:

Ann L DeMarais, Assistant United States Attorney
United States Attorney's Office